

April 23, 2006

Nadine Pelligrini
Assistant United States Attorney
District of Massachusetts
United States Courthouse, Suite 9200
1 Courthouse Way
Boston, MA 02210

Re: United States v. Paul Hicks
Docket Number 1:05-cr-10204

Dear Attorney Pelligrini:

Please be advised that pursuant to Local Rule 116.2 and 116.3(J) I am requesting discovery outside of the initial forty-two (42) day period. Specifically, I am seeking the exact dates and times of the two alleged controlled buys of Cocaine the confidential informant made from the defendant, and the work records showing time of shift for Trooper Richard F. Long of the Massachusetts State Police for the dates of the alleged buys.

This request was prompted by information not reasonably known by counsel within the deadline for discovery. Please contact me as soon as possible. If we cannot reach agreement on this issue I will file a formal discovery motion with the court.

Very Truly Yours,

/s/ Joseph F. Krowski Jr.
Joseph F. Krowski Jr.

cc. By Electronic Filing
Paul Lyness, clerk for the Honorable Judge George A. O'Toole Jr.